



Eastern Electric Apparatus Repair Company, Inc.
 2814 Spring Road, Suite 100
 Atlanta, GA 30339
 Tel: (770) 801-0084
 Fax: (770) 801-8400

H2W1

WAD 980738462

RECEIVED

APR 23 1999

DEPT OF ECOLOGY

February 19, 1999

State of Washington
 Department of Ecology
 Community Right-To-Know Unit
 P.O. Box 47659
 Olympia, WA 98504-7659

Attn: Environmental Compliance Manager
 or Safety/Health Coordinator

Dear Madam/Sir:

As required under Section 312 of the Superfund Amendments and Reauthorization Act of 1986, attached is a Tier Two Emergency and Hazardous Chemical Inventory and a Material Safety Data Sheet for hazardous substances that are present in quantities at or in excess of 10,000 pounds at the Eastern Electric Apparatus Repair Company facility located at 10831 East Marginal Way South, Seattle, Washington 98168.

The information provided on the Tier Two Emergency and Hazardous Chemical Inventory is based on my inquiry of those individuals responsible for the management of the Seattle facility and my knowledge of the Service Center's operation.

If you have any questions on this matter or need any additional information, please contact me at the letterhead address or phone (770) 801-1149.

Very truly yours,

EASTERN ELECTRIC APPARATUS
 REPAIR COMPANY, INC.

Walter C. Becker

Walter C. Becker
 Vice President, Environmental/Safety Programs

4-27-99
 ALICE,
 HERE IS A COPY OF
 THE 1999 TIER TWO
 INVENTORY + A MSDS
 FOR THE VARNISH. ALSO
 A MSDS FOR THE LATHE
 COOLANT.
 LARRY ROBINSON



State of Washington
February 19, 1999
Page 2

cc: Mr. Rich Tokarzewski
King County Office of Emergency Management
7300 Perimeter Road, South
Room 128
Seattle, WA 98108

Fire Chief
Tukwila Fire Department
444 Andover Park East
Tukwila, WA 98188

Jim Pepper
Eastern Electric Apparatus Repair Company
10831 East Marginal Way South
Seattle, WA 98168

MATERIAL SAFETY DATA SHEET

WESTINGHOUSE ELECTRIC CORPORATION
 (ADOPTED FROM USDL FORM OSHA-20)

DATE OF PREPARATION: 25 AUG 81
 REV NO: 4

SECTION I PRODUCT IDENTIFICATION

PRODUCT CLASS VARNISH	TRADE NAME LOW TEMP. MOD. POLYESTER	PRODUCT NO. (W)PDS BEI-915A
MANUFACTURING DIVISION AND ADDRESS WESTINGHOUSE ELECTRIC CORPORATION ELECTRICAL MATERIALS DIVISION RT 993 MANOR, PA 15665		EMERGENCY PHONE NUMBER 412-864-8200

SECTION II HAZARDOUS INGREDIENTS

INGREDIENTS	CAS NUMBER	PERCENT BY WT	TLU	PEL
M&P NAPHTHA	8032-32-4	25	300 PPM	300 PPM
STEL:				400 PPM
YLENE	1330-20-7	15	100 PPM	100 PPM
STEL:			150 PPM	100 PPM
ARSOL	64742-88-7	5	100 PPM	500 PPM
RECOMMEND LIMITS FOR DODDARD SOLVENT AS GUIDE				

SECTION III PHYSICAL DATA

BILING RANGE 5 DEG C 240 DEG F	VAPOR DENSITY 3.8	EVAPORATION RATE (NBUAC - 1) 9.2
VOLATILE BY VOLUME %	SPECIFIC GRAVITY 0.893	VAPOR PRESSURE (MM HG) 15 @ 100 F
PEARANCE BER LIQUID	SOLUBILITY IN WATER NEGLEGIBLE	

SECTION IV FIRE AND EXPLOSION DATA

T CATEGORY INT FLAMMABLE QUID UN-1263 I-915A	FLASH POINT / METHOD USED 61 DEG F TCC	FLAMMABILITY LIMITS LEL UEL 0.9 6.0
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REV NO: 4

PAGE: 01

EXTINGUISHING MEDIA:

Dry chemical, regular foam, carbon dioxide.

SPECIAL FIRE FIGHTING PROCEDURES:

Self-contained breathing apparatus with a full facepiece operated in a pressure demand or positive pressure mode.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Material is highly volatile and readily gives off vapors which may travel along the ground or be moved by ventilation and cause flash fires or be ignited explosively by pilot lights, other flames sparks, heaters, smoking, electric motors, or other sources of ignition at locations distant from material handling point.

SECTION V HEALTH HAZARD INFORMATION

EFFECTS OF OVEREXPOSURE:

SKIN: Can cause redness, swelling, blisters. Prolonged exposure can cause defatting, follicular dermatitis.

EYES: May cause skin sensitization, photosensitization.

EYES: Can cause irritation with redness, tearing and blurred vision.

INHALATION: Intoxication, burning sensation mouth, throat, stomach, vomiting, weakness, drowsiness, coma.

INGESTION: Local irritation, burning sensation mouth, throat, stomach. vomiting, diarrhea, drowsiness, and other inhalation symptoms. Rapid breathing, cyanosis, tachycardia indicates possible aspiration. This is then followed by massive pulmonary edema, hemorrhage. Death from asphyxiation possible.

EMERGENCY AND FIRST AID PROCEDURES:

SKIN: Thoroughly wash exposed area with soap and water. Remove contaminated clothing. Launder contaminated clothing before reuse.

EYES: Flush with large amounts of water occasionally lifting upper and lower lids.

INHALATION: If affected, remove individual to fresh air. If breathing is difficult, administer oxygen. If breathing is stopped, give artificial respiration. Keep person warm, quiet, and get medical attention.

INGESTION: Do not induce vomiting. Keep person warm, quiet and get medical attention. Aspiration of material into the lungs may result in chemical pneumonitis which can be fatal.

STABILITY: Stable
HAZARDOUS POLYMERIZATION: Will not occur.

INCOMPATIBILITY:

MATERIALS TO AVOID: Avoid contact with strong oxidizing agents.

CONDITIONS TO AVOID: Heat, sparks, open flames.

PRODUCTS OF COMBUSTION:

Burning may produce carbon monoxide and/or carbon dioxide and water.
Incomplete combustion may produce toxic vapors.

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Avoid contact with liquid or solid. Avoid breathing vapors. Use protective measures outlined in Section VIII below.

SMALL SPILL: Absorb liquid on absorbent material and transfer to hood.

LARGE SPILL: Stop spill at source, dike area of spill to prevent spreading, pump liquid to salvage tank.

WASTE DISPOSAL METHOD:

SMALL SPILL: Allow solvent to evaporate in hood. Dispose of solids in compliance with Federal, State, and local regulations.

LARGE SPILL: Dispose of in compliance with Federal, State and local regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION:

If TLU of the product or any component is exceeded, use NIOSH approved self-contained breathing apparatus.

VENTILATION:

Provide sufficient mechanical (general) and/or local exhaust ventilation to maintain exposure below TLU.

PROTECTIVE GLOVES:

Neoprene, Buna-N.

EYE PROTECTION:

Chemical splash goggles.

OTHER PROTECTIVE EQUIPMENT

Wear impervious clothing and boots.

SECTION IX SPECIAL PRECAUTIONS**PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:**

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid) all hazard precautions given in this data sheet must be observed.

OTHER PRECAUTIONS:

Keep container tightly closed.

Chronic overexposure to product can produce blood disorders and reversible liver and kidney damage.

SECTION X REGULATORY REQUIREMENTS**OSHA SECTION 313 SUPPLIER NOTIFICATION:**

THIS PRODUCT CONTAINS THE FOLLOWING TOXIC CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF THE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986 AND OF 40 CFR 372:

<u>OSHA NUMBER</u>	<u>CHEMICAL NAME</u>	<u>PERCENT BY WEIGHT</u>
130-20-7	XYLENE	15

THIS INFORMATION MUST BE INCLUDED IN ALL MSDS's THAT ARE COPIED AND DISTRIBUTED FOR THIS MATERIAL.

THIS MATERIAL SAFETY DATA SHEET IS OFFERED SOLELY FOR YOUR INFORMATION, CONSIDERATION, AND INVESTIGATION. WESTINGHOUSE PROVIDES NO WARRANTIES, EITHER EXPRESSED OR IMPLIED, AND ASSUMES NO RESPONSIBILITY FOR THE ACCURACY OR COMPLETENESS OF THE DATA CONTAINED THEREIN. "WESTINGHOUSE EXPRESSLY DISCLAIMS ANY LIABILITY WHICH MAY BE INCURRED IN USING THE INFORMATION CONTAINED HEREIN."

**Eastern Electric**

A Grand Eagle Company

Eastern Electric Apparatus Repair Co, Inc

10831 E. Marginal Way South

Seattle, WA 98168

Tel: (206) 767-9506

Fax: (206) 767-0556

HZWI

WAD980738

TRANSMISSION COVER SHEET

TOTAL PAGES INCLUDING COVER: 9DATE: 6-9-99TO: ALICE NORTHFROM: LARRY ROBINSON

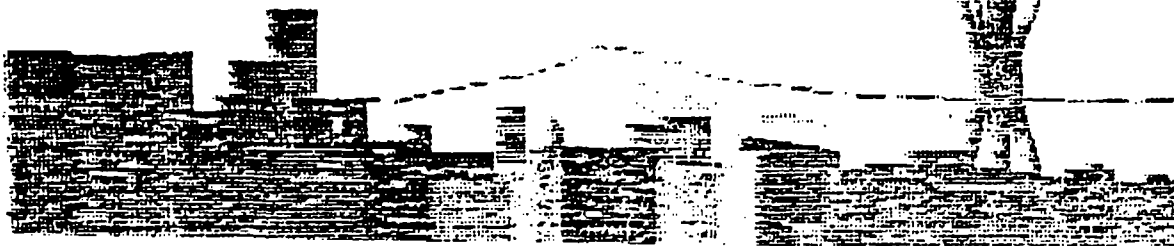
FAX NO: _____

QUOTE NO: _____

SUBJECT: _____

ALICE,

HERE IS THE COPY OF THE
LAB REPORT WE TALKED ABOUT
ON THE PHONE.

LARRY

Sound Analytical Services, Inc.
ANALYTICAL & ENVIRONMENTAL CHEMISTS
4813 Pacific Hwy East • Tacoma, WA 98424
(253) 922-2310 • FAX (253) 922-5047
e-mail: Sound1@aol.com



TRANSMITTAL MEMORANDUM

DATE: October 24, 1997

TO: Larry Robinson
Eastern Electric
10831 East Marginal Way, South
Seattle, WA 98168

PROJECT: Steam Cleaner Sludge

REPORT NUMBER: 68223

Enclosed are the test results for one sample received at Sound Analytical Services on October 17, 1997.

The report consists of this transmittal memo, analytical results, quality control reports, a copy of the chain-of-custody, a list of data qualifiers and analytical narrative when applicable, and a copy of any requested raw data.

Should there be any questions regarding this report, please contact me at (253) 922-2310.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Tom Boyden'. The signature is written in dark ink and is positioned above the printed name.

Tom Boyden
Project Manager

SOUND ANALYTICAL SERVICES, INC.

ANALYTICAL & ENVIRONMENTAL CHEMISTS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (253)922-2310 - FAX (253)922-5047

Report To: Eastern Electric

Date: October 24, 1997

Report On: Analysis of Solid

Report No.: 68223

IDENTIFICATION:

Samples received on 10-17-97

Project: Steam Cleaner Sludge

ANALYSIS:

Lab Sample No. 68223-1

Client ID: Steam Cleaner Sludge

General Chemistry

Units: mg/L

<u>Parameter</u>	<u>Method</u>	<u>Result</u>
Flash (Seta °F)	EPA 1020	> 200
pH	EPA 9045	8.19

SOUND ANALYTICAL SERVICES, INC.

ANALYTICAL & ENVIRONMENTAL CHEMISTS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (253)922-2310 FAX (253)922-5047

Report To: Eastern Electric

Date: October 24, 1997

Report No. 68223

Sample Preparation Information for Toxicity Characteristic Leaching Procedure (TCLP) by EPA Method 1311

Lab Sample No.	68223-1
Client ID:	Steam Cleaner Sludge
% Solids:	36.29
No. of extractions:	1
Type of extraction:	rotary
Extraction fluid:	#1
Date Extracted:	10-21-97

SOUND ANALYTICAL SERVICES, INC.

Client Name	Eastern Electric
Client ID:	STEAM CLEANER SLUDGE
Lab ID:	68223-01
Date Received:	10/17/97
Date Prepared:	10/22/97
Date Analyzed:	10/22/97
Dilution Factor	1

TCLP Metals by ICP - USEPA Method 6010

Analyte	Result (mg/L)	PQL	Flags
Arsenic	ND	0.4	
Barium	4.2	0.005	
Cadmium	0.1	0.08	
Chromium	0.017	0.01	
Lead	0.27	0.15	
Selenium	ND	0.5	
Silver	ND	0.02	

SOUND ANALYTICAL SERVICES, INC.

Client Name	Eastern Electric
Client ID:	STEAM CLEANER SLUDGE
Lab ID:	68223-01
Date Received:	10/17/97
Date Prepared:	10/23/97
Date Analyzed:	10/23/97
Dilution Factor	1

TCLP Mercury by CVAA - USEPA Method 7470

Analyte	Result (mg/L)	PQL	Flags
Mercury	ND	0.002	

SOUND ANALYTICAL SERVICES, INC.

Client Name	Eastern Electric
Client ID:	STEAM CLEANER SLUDGE
Lab ID:	68223-01
Date Received:	10/17/97
Date Prepared:	10/22/97
Date Analyzed:	10/22/97
% Solids	36.29

PCBs by USEPA Method 8080

Surrogate	% Recovery	Flags	Recovery Limits	
			Low	High
TCMX	52	X9	77	126
Decachlorobiphenyl	28	X9	79	141

Sample results are on a dry weight basis.

Analyte	Result (mg/kg)	PQL	Flags
Aroclor 1016	ND	0.27	
Aroclor 1221	ND	0.27	
Aroclor 1232	ND	0.27	
Aroclor 1242	2.5	0.27	
Aroclor 1248	ND	0.27	
Aroclor 1254	3.5	0.27	
Aroclor 1260	2.6	0.27	
Aroclor 1262	ND	0.27	
Aroclor 1268	ND	0.27	

SOUND ANALYTICAL SERVICES, INC.

Client Name	Eastern Electric
Client ID:	STEAM CLEANER SLUDGE
Lab ID:	68223-01
Date Received:	10/17/97
Date Prepared:	10/22/97
Date Analyzed:	10/23/97
% Solids	36.29

BTEX Compounds by USEPA Method 8020 Modified

Surrogate	% Recovery	Flags	Recovery Limits	
			Low	High
Trifluorotoluene	40		37	125

Sample results are on a dry weight basis.

Analyte	Result (mg/kg)	PQL	Flags
m,p-Xylene	7	0.11	
o-Xylene	3.6	0.054	

206 767 0556 P.09

SOUND ANALYTICAL SERVICES, INC.

ANALYTICAL & ENVIRONMENTAL CHEMISTS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (253)922-2310 - FAX (253)922-5047

QUALITY CONTROL REPORT

General Chemistry

Client: Eastern Electric
Lab No: 68223q

QC Batch No. 519
Sample No. 68223-1
Date Analyzed: 10-21-97

DUPLICATE

Parameter	Sample Result	Duplicate Result	RPD	Flag
pH	8.19	8.41	2.6	

RPD = Relative Percent Difference



SAFETY-KLEEN SAMPLE ANALYSIS REPORT
Prequalification Report

SAMPLE DESCRIPTION:

Steam Cleaning Sludge

PAGE 1

REPORT DATE: 12-16-98

S-K REPRESENTATIVE: David Poshka

NOT COMPLETE

BRANCH #: 118101

CONTROL #: 1831598-7

CUSTOMER #: 1181-01-9160

PROJECT:

PREQ

SURVEY #: 2008859

SAMPLE TYPE:

Non-Haz Evaluation

LAB #: 9831598

Generator:

Eastern Electric
10831 E Marginal Way S
Seattle, WA 98168
(206)767-9506

Attention:

Larry Robinson

The enclosed Safety-Kleen *Prequalification Report* shows that your company's sample has been partially reviewed and determined to require more evaluation by Corporate Review Group.

A Safety-Kleen representative will be contacting you with further detail regarding the shipping, handling, and processing of your material.

Please review and contact your Safety-Kleen representative or branch facility listed above if you have any questions.

Dr. James L. Breese
Vice President, Technical

Safety-Kleen Corp. Technical Center

P.O. Box 92050
Elk Grove Village, IL 60009-2050
Fax: (773) 825-7853

12555 W. Old Higgins Rd.
Elk Grove Village, IL 60007
Telephone: (773) 825-7338

HZW 3,2
4/26/99

Continued on next page

Control #: 1831598-7
Survey #: 2008859

HOLD FOR CORPORATE REVIEW

PAGE 2
Eastern Electric

Fluid Recovery Services

STATUS

S-K REPRESENTATIVE: David Poshka
BRANCH/ARM #: 118101

**HOLD FOR
CORPORATE
REVIEW**

SAMPLE DESCRIPTION: Steam Cleaning Sludge

RECEIVED: 11/20/98
COMPLETED: 12/2/98
REVISED: 12/2/98
REPORT DATE: 12/16/98

CONTROL #: 1831598-7
SURVEY #: 2008859
LAB #: 9831598

Nature of Business: Electrical Mfg.

S.I.C.:

Status: SQG

Facility Address:
10831 E Marginal Way S
Seattle, WA 98168

Billing Address:

Process Description: Steam Cleaning Machine Parts
Material Description: Steam Cleaning Sludge
Generation Amount: 220 Gallons Quarterly
Gallons On Hand:

P.O. #:
Contact: Larry Robinson

Date Survey Signed: 11/17/98
Title: Pcb Specialist
Phone: (206)767-9506

Survey Comments: LAIDLAW PROFILE ENCLOSED
REGULATED A09 - STEAM PIT SLUDGE, DIRT, CYL. WATER

B409 - STEAM PIT SLUDGE: NON

The analysis contained herein are performed solely for the purpose of qualifying the analyzed materials for acceptance by Safety-Kleen Corp. in accordance with its permits and processing capability.

CORPORATE REVIEW

Disposition: Hold for Corporate Review
Review Date: 12/2/98

Part Number:
Reviewers: AAD

APPROVED FACILITIES:

FED EPA Number :
State EPA Number :
Telephone :
State Authorization :
Additional Description :

HZW 3.2 4/26/99
Continued on next page

APPROVED DOT - SHIPPING DESCRIPTION

SKDOT #:

State/Prov. Codes:

US EPA Waste Codes:

REVIEW COMMENTS

for incineration

WARNING - This prequalification is not completed. See disposition and comments.

GENERAL ANALYSIS

Phase:	TOTAL			
	<u>Parameter</u>	<u>Date Analyzed</u>	<u>Result</u>	<u>Units</u>
	Water Compatibility	11/24/98	Compatible	
	pH by Meter Direct	11/24/98	11.4	
	Water Content	11/24/98	68	wt. %
	Color	11/24/98	GRAY, DK GRAY	
	Radioactivity	11/23/98	None Detected	
	Bulk Density	11/24/98	1.06	
	Flammability at 73 F	11/23/98	No Flash	
	Flammability at 140 F	11/23/98	No Flash	
	Non-Volatile Residue at 105 C	11/23/98	32	wt. %
	NVR Description at 105 C	11/23/98	SOLID	
Phase:	AQUEOUS			
	<u>Parameter</u>	<u>Date Analyzed</u>	<u>Result</u>	<u>Units</u>
	Viscosity	11/24/98	<50	cps
	Phase % by Appearance	11/24/98	51	vol. %
Phase:	SOLIDS			
	<u>Parameter</u>	<u>Date Analyzed</u>	<u>Result</u>	<u>Units</u>
	Viscosity	11/24/98	>50000	cps
	Phase % by Appearance	11/24/98	49	vol. %
	Non-Volatile Residue at 105 C	11/24/98	55	wt. %
	NVR Description at 105 C	11/24/98	SOLID	

HZW3,2-4/26/99
Continued on next page

ELEMENTAL ANALYSIS

Phase: TOTAL

<u>Element</u>	<u>Symbol</u>	<u>Characteristic Waste Code</u>	<u>Date Analyzed</u>	<u>Result</u>	<u>Units</u>
Antimony	Sb		11/25/98	65	mg/Kg
Arsenic	As	D004	11/25/98	<24	mg/Kg
Barium	Ba	D005	11/25/98	280	mg/Kg
Beryllium	Be		11/25/98	<4.8	mg/Kg
Cadmium	Cd	D006	11/25/98	7.9	mg/Kg
Chromium	Cr	D007	11/25/98	90	mg/Kg
Cobalt	Co		11/25/98	8.8	mg/Kg
Copper	Cu		11/25/98	3000	mg/Kg
Iron	Fe		11/25/98	9900	mg/Kg
Lead	Pb	D008	11/25/98	190	mg/Kg
Magnesium	Mg		11/25/98	1100	mg/Kg
Manganese	Mn		11/25/98	98	mg/Kg
Mercury	Hg	D009	11/25/98	<24	mg/Kg
Nickel	Ni		11/25/98	350	mg/Kg
Phosphorus	P		11/25/98	150	mg/Kg
Selenium	Se	D010	11/25/98	<48	mg/Kg
Silicon	Si		11/25/98	15000	mg/Kg
Silver	Ag	D011	11/25/98	4.2	mg/Kg
Thallium	Tl		11/25/98	<72	mg/Kg
Titanium	Ti		11/25/98	1100	mg/Kg
Vanadium	V		11/25/98	16	mg/Kg
Zinc	Zn		11/25/98	550	mg/Kg

FUEL ANALYSIS

Phase: TOTAL

	<u>Date Analyzed</u>	<u>Result</u>	<u>Units</u>
Heat Content	11/24/98	821	Btu/lb
Ash Upon Combustion	11/24/98	12	wt. %
Total Halogens	11/25/98	<0.10	wt. %
Total Fluorine	11/25/98	<0.015	wt. %
Total Chlorine	11/25/98	<0.021	wt. %
Total Bromine	11/25/98	<0.019	wt. %
Total Sulfur	11/25/98	0.040	wt. %

H ZW 3.2 4/26/99

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VOLATILE ORGANIC ANALYSIS

Phase: AQUEOUS

Compound Name

CAS Number

Result

Units

No Volatile Organics Detected (<0.1% Each)

0

wt. %

Phase: SOLIDS

Compound Name

CAS Number

Result

Units

No Volatile Organics Detected (<0.1% Each)

0

wt. %

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBs):

Compound Name

Result

Units

Aroclor 1016

<1.0

mg/Kg

Aroclor 1221

<1.0

mg/Kg

Aroclor 1232

<1.0

mg/Kg

Aroclor 1242

<1.0

mg/Kg

Aroclor 1248

<1.0

mg/Kg

Aroclor 1254

6.3

mg/Kg

Aroclor 1260

<1.0

mg/Kg

Aroclor 1262

<1.0

mg/Kg

Aroclor 1268

<1.0

mg/Kg

Total PCB's

6.3

mg/Kg

ANALYTICAL SERVICES

Comments: Water estimated by difference on Total.

HZW 3.2/4/6/99

End of Document



Dangerous Waste Compliance Checklist

TYPE OF VISIT: TECHNICAL ASSISTANCE COMPLIANCE INSPECTION COMPLAINT # Other
Opening Conference: Yes ☐ Site Tour: Yes ☒ No ☐ Records Review: Yes ☒ No ☐ Closing Conference: Yes ☒ No ☐

Site

Site Name: Eastern Electric Apparatus Repair (fka Westinghouse) WAD980738462

Site Contact(s): Larry Robinson, Jim Pepper

Title : Environmental PCB Coordinator, Service Center Manager

Phone: (206) 767-9506

Address: 10831 East Marginal Way South, Mailing Address: Same

City: Seattle Co: King Zip: 98168-1931 Years on Site: SIC# 7629

Generator/Facility Status (circle or bold): SQG MQG LQG TSD Recycler Other

Type of Business: Electrical Transformer Repair Shop

Ecology

Lead Contact: Alice North Phone: (425) 649-7142 FAX (425) 649-7098

Other Representatives: Pinky Esperanza Feria

Time On Site: 2:15 PM

Time Off Site: 3:45 PM

Report Date: April 27, 1999

Report By: Alice North

Process Information

Processes that Generate Wastes: Repair of Industrial Transformers, paint spray booth, Parts cleaners

Waste Streams (description or codes): Waste Paint materials (F003 F005 D001 D035), waste xylene (F003 D001 WT02), spent petroleum naptha (D039 D008 D018 D040), paint booth filters (D007), tetrachloroethylene (one time waste from transformer) (D039 WT02)

Pollution Prevention Suggestions, Technical Assistance Referrals

Improved inventory control can prevent waste generated by out-of-date, off-specification,

contaminated or unnecessary raw material. Some methods to improve inventory control include:

- Centralized inventory management.
- If materials have a limited shelf life, buy them in smaller containers instead of in bulk.
- Purchase materials in returnable containers or recycle the containers.
- Use Just-In-Time manufacturing to reduce waste from expired and discontinued material.
- Use programs such as the Industrial Materials Exchange (IMEX) to buy and sell surplus materials
- Return surplus material and product samples to your supplier.
- Purchase materials in returnable containers or recycle the containers
- Make sure your supplier allows return of damaged containers or products

Chemicals comprise a major source of hazardous substances wasted. Misuse, spills, inefficient handling and improper uses result in significant pollution streams. Tracking chemical use includes purchasing, inventory, use, and waste generation. This tracking system may also include waste composition analysis. Significant changes in tracked data will detect the location and cause of problems. Proper transportation, storage and handling are necessary to avoid losses. For more information or assistance call 425-649-7040.

Conditions Not in Compliance

See line # below

WAC 173-303-070 (1)(a); (3)(iv): Designation of Dangerous Waste Generators are responsible for designating their waste as either dangerous waste or extremely hazardous waste. Designation records need to be kept on site for five years.

1

(A) The steam parts washer sludge may be a Dangerous Waste and should be designated to determine waste characteristics, especially total metals and total organics. Designation of waste for state criteria, as required by Ecology, was pending and would soon be completed.

(B) Designate dried polyester varnish in the unused dip tank, if it is a waste, dispose of it properly.

WAC 173-303-200(1)(c) (d) Accumulating Dangerous Waste on Site Containers of paint booth dangerous waste were not marked with the date accumulation began. Containers of paint booth dangerous waste were not identified with the words "Hazardous Waste" or "Dangerous Waste" and the major risk(s) associated with the waste were not indicated.

7

WAC 173-303-200(2)(c): Satellite accumulation standards were not met since the paint booth drums at the satellite accumulation area were not labeled properly with the words "Hazardous Waste".

9

Line No.	Violation	WAC 173-303	Line No.	Violation	WAC 173-303
WASTE MANAGEMENT			ADMINISTRATION RECORDS		
1	Waste Designation	-170(1)	20	Notification & Identification #s	-060(2)
2	Failure to Offer Waste to TSD	-141	21	Manifesting	-180
3	Spills/Discharges	-145	22	Large Quantity Generator Plans	-200(1)(b), -320 to -360
4	Treatment-by-Generator	-170(3)	23	Recordkeeping Retention Times	-210
5	Accumulation Time Limits	-200(1)(a)	24	Annual Report/Exception Report	-220
6	Accumulation in Containers/Tanks	-200(1)(b), see 630/640	25	Personnel Training Requirements	-330
7	Container/Tank Labeling	200(1)(b)(c) (d)	26	Preparedness & Prevention	-340
8	Secondary Containment	-200(1)(b)	27	Contingency Plan	-350
9	Satellite Accumulation	-200(2)	28	Emergencies	-360
10	Medium Quantity Generator	-201(c)	29	Permit-by-Rule	-802(5)
11	Ignitable/Reactive/ Incompatible Wastes	-395		OTHER DANGEROUS WASTE VIOLATIONS	
12	Used Oil Burned for Energy	-515	30		
13	Use/Mgmt. of Containers	-630	31		
14	- Condition of containers	-630(2)	32		
15	- Compatible containers	-630(4)	33	OTHER ENVIRONMENTAL LAW CONCERNS	
16	- Closed containers	-630(5)(a)	34	If materials and wastes must be stored outside a Stormwater Pollution Prevention Plan needs to be developed and sent into Ecology Water Quality, call 425-649-7037.	
17	- Container handling	-630(5)(b)	35		
18	- Weekly Inspections	-630(6)	36		
19	- Secondary Containment	-630(7)	37		

Reminder: Ecology will provide a copy of the text of regulations for which violations are cited.

Questions, Concerns, Comments

The steam cleaning process sign above the pressure washing steam process and drain was unreadable and needs to be moved and repainted so that it is readable.

Ecology will: Send a disk with labels on it and send Guidance for Stormwater Pollution Prevention Planning
Owner/Operator will:

COMPLIANCE ACTIONS REQUIRED

Instructions: The actions identified below are necessary in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Please indicate the date an action is completed and initial each item. If an action is not completed, please note in the "Date Completed" column and explain on back of this page.

Return Completed Form or Request for Extension -- Upon completion of all actions listed above, please mail a copy of this form to the Washington Department of Ecology at the address listed below. An extension of the deadlines to achieve compliance may be requested. Please make a request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to the Ecology Lead Contact by **June 14, 1999**. Ecology will provide a written approval or denial of your request.

No.	Action(s) Needed to Achieve Compliance	By When?	Date Completed	Initial
1	Waste Designation: Immediately upon receipt of this report, and after receipt of the test results for steam parts washer sludge, send results into Ecology. Test results were pending to determine hazardous waste constituents. These pending analytical test results will demonstrate the characteristics of the sludge, and include total metals and total organics.	6/14/99		
7	Container/ Tank Labeling: Upon receipt of this report, ensure that the accumulation start date is clearly written on all paint waste containers holding dangerous waste.	Immediately		
9	Satellite Accumulation: upon receipt of this report, ensure that all paint waste containers at satellite accumulation areas are properly labeled with an accumulation start date.	Immediately		

Ecology Lead Contact: Alice North *Alice North*

Date: 5/11/99

Address: 3190 160th Avenue SE, Bellevue, WA 98008-5452

Received By: _____

This checklist serves as a notice of deficiency for technical assistance visits or a notice of correction for other site visits as provided for in the Washington State Law "Implementing Regulatory Reform", Chapter 403, Laws of 1995.

Follow-up by Ecology: Phone ☐ Letter ☐ Revisit ☐ None ☐
 Photos Taken: Yes / No Samples Taken: Yes / No Splits Offered: Yes / No
 Documents Left: Regulations ☐ Step by Step ☐ TIMs ☐ Focus Sheets ☐
 Additional _____

Assistance/Enforcement Programs Explained: Yes / No

If you have any questions about information in this Checklist, please call the Ecology Lead Contact. The Department of Ecology is an equal opportunity agency. If you have special accommodation needs, contact Felicia Curtis at (360) 407-6721 or Julie Carrasco at (360) 407-6199 (Voice), or (360) 407-6006 (TDD).